

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY)	
AVERAGE WHOLESALE PRICE)	MDL No. 1456
LITIGATION)	
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THIS DOCUMENT RELATES TO:)	CIVIL ACTION: 01-CV-12257-PBS
)	Judge Patti B. Saris
ALL ACTIONS)	
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PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiffs, by their attorneys, respectfully move this Court for leave to file under seal the following pleadings and other materials: (1) Plaintiffs' Memorandum in Support of Motion to Quash May 18, 2006 Amended Notice of Deposition of Harvey Weintraub Filed by Defendant Warrick Pharmaceuticals Corporation; and (2) Exhibit 1 to the Declaration of Steve W. Berman in Support of Plaintiffs' Motion to Quash May 18, 2006 Amended Notice of Deposition of Harvey Weintraub.

The foregoing items include or reference patient health information that has been filed under seal in other litigation.

WHEREFORE, Plaintiffs respectfully request that this Court grant them leave to file the foregoing listed materials under seal.

DATED: June 22, 2006

By /s/ Steve W. Berman

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**CO-LEAD COUNSEL FOR
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CERTIFICATE OF SERVICE

I hereby certify that I, Steve W. Berman, an attorney, caused a true and correct copy of the foregoing **PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL** be delivered to all counsel of record by electronic service pursuant to Paragraph 11 of the Case Management Order No. 2, by sending on June 22, 2006, a copy to LexisNexis File and Serve for Posting and notification to all parties

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